

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

MARTHA SANDEFUR,)	
)	
Plaintiff,)	
)	
v.)	No. 3-15-cv-552
)	
YATES SERVICES, LLC,)	SENIOR JUDGE HAYNES
)	MAGISTRATE JUDGE HOLMES
Defendant.)	JURY DEMAND

DEFENDANT’S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Pursuant to Administrative Order No. 167, § 5.07, Defendant Yates Services, LLC (“Yates”) respectfully moves for leave to file the following document under seal:

(1) Exhibit A to the Declaration of Dan Smith.

As grounds for this Motion, Yates states that the above document is being designated as “Confidential” pursuant to the Agreed Protective Order (ECF No. 18). This is because the document contains sensitive protected information – particularly the names of non-party employees reporting work-related injuries – which Yates desires to be kept confidential. This information is necessary to file in connection with Yates’ Motion for Summary Judgment. Consistent with the Agreed Protective Order, Yates requests to file such information under seal, given the sensitive nature of such information.

For the reasons explained above, Yates respectfully requests that the above-identified document filed contemporaneously herewith be sealed.

Respectfully submitted,

s/ J. Craig Oliver

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Attorneys for Defendant, Yates Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via the Court's electronic case filing system to:

Jeffrey M. Levine
Law Offices of James A. Flexer
1900 Church Street, Suite 400
Nashville, TN 37203

on this 4th day of April, 2016.

s/ J. Craig Oliver

J. Craig Oliver